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Court File No. CV-22-30791

ONTARIO

SUPERIOR COURT OF JUSTICE

BETWEEN:

AUTOMOTIVE PARTS MANUFACTURERS' ASSOCIATION

Plaintiff/Moving Party

AND:

JIM BOAK, JOANNE CALLAWAY, HILDA FISHER, LORI INVERARITY, LEO LUCIO, GIL PONTE, MANBAE SINGH-GALL, DARLENE THOMPSON and JOHN DOE

Defendants/Responding Parties

AND:

THE CORPORATION OF THE CITY OF WINDSOR, ATTORNEY GENERAL FOR ONTARIO and THE DEMOCRACY FUND

Intervenors

SUPPLEMENTAL AFFIDAVIT OF SHERRI MARIE PERONI

I, Sherri Marie Peroni, of the City of Windsor, in the County of Essex,

MAKE OATH AND SAY *(or* AFFIRM*)*:

1. I am a legal assistant employed by Antoine d'Ailly Law Office, have knowledge of the matters herein deposed, and am familiar with the roadways and sidewalks in the areas in and around the entrance/exit to the Ambassador Bridge having resided in Essex County since 1983;

2. On Friday, February 18, 2022, the CBSA Wait Time Report indicated "No delay" at the Ambassador Bridge, at the Windsor and Detroit Tunnel, at the border crossing located in Coutts, Alberta, and "15 minutes" (Commercial Flow) and "No delay" (Travellers Flow) at the Blue Water Bridge. A printout of the webpage is attached hereto as **EXHIBIT "A";**

3. On or about February 12, 2022, I viewed online two photographs which based on my information and belief was taken at the corner of Huron Church Rd and College Ave which purports to show law enforcement

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enforcing the injunction dated February 11, 2022. A copy of those photos is attached hereto as **EXHIBIT "B"**.

4. On February 16, 2022, a Windsor Star article retrieved online titled "West end businesses feeling impact of Huron Church closures post-blockade" states that "with the bridge now cleared, it's traffic control measures meant to prevent another blockage [that is] causing headaches", and that "Huron Church Road is open only to border-bound bridge traffic from E.C. Row Expressway to Patricia Road, where transport trucks enter onto the bridge", and that "regular traffic is being rerouted, and east/west traffic crossing Huron Church at major intersections has been blocked." The article further states that "the strategy is costly for local businesses". A copy of the articles is attached hereto as **EXHIBIT "C"**;

5. On February 18, 2022, a CNBC news article retrieved online titled "Renault expects to make 300,000 fewer cars in 2022 as global chip shortage rumbles on". The articles states that "Renault expects the chip crunch to become less severe this year, adding that a 'normal situation' should resume in the second half of 2022", and that "Renault reported a $1 billion net profit for 2021 on Friday, beating estimates", and that it has an "operating margin of 3.6%". A copy of the article is attached hereto as **EXHIBIT "D"**;

6. In the course of my employment and personal life, I have also developed familiarity with the frustrations of demonstrators who are protesting against government overreach with respect to the public health mandates and measures made in response to COVID-19, which include, *inter alia*, the economic impact on small businesses.

7. On February 10, 2022, a CBC news article retrieved online titled "Windsor couple weighs closing pet store after being left out of COVID-19 relief funding" reports that the couple are in debt to the tune of about $180,000 because of lockdowns, restrictions and a shortage of goods due to supply chain issues", and that "they have lost so much money they say they couldn't reopen this year and their store is temporarily closed and may not reopen if they don't get relief". A copy of the article is attached hereto as **EXHIBIT "E"**;

8. On February 16, 2022, an article published by The Record retrieved online titled "What does Ontario's decision on vaccine mandates mean for laid-off unvaccinated workers?" reports that "the health care sector

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in particular saw a large exodus when it mandated vaccinations last fall, with hundreds of workers from multiple departments leaving the region's hospitals in a time when staffing shortages have plagued the industry." A copy of the articles is attached hereto as **EXHIBIT "F"**;

9. It has come to my attention that there is a planned protest for Saturday, February 19th @ 2pm at the Great Canadian Flag at Windsor Riverfront, and that a poster titled "Hold the Line Against Medical Tyranny" is circulating on social media, and that the event is described as "Windsor Regroups to Rally at the Flag". A copy of the poster is attached hereto as **EXHIBIT "G"**;

10. I make this Affidavit in good faith and for no improper purpose.

Sworn remotely by Sherri Marie Peroni stated as being located in the City of Windsor, in the County of Essex, Province of Ontario, before me at the City of Windsor, in the County of Essex, Province of Ontario, on February 18, 2022, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:
Antoine D'Ailly
9D5B00407E27457...

.....

Commissioner for Taking Affidavits

Antoine Jean d'Ailly, Barrister and Solicitor
My Commission does not expire

DocuSigned by:
Sherri Marie Peroni
211B0629F0D4492...

.....

Sherri Marie Peroni

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This is **EXHIBIT "A"**
Referred to in the Supplemental Affidavit of
SHERRI MARIE PERONI
Sworn before me this 18th day of February, 2022

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Antoine D'Ailly
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A Commissioner, etc.

Government of Canada | Gouvernement du Canada

B-1-33

Border wait times: United States to Canada

Mandatory to use ArriveCAN to submit COVID-19 pre-entry test results

Use ArriveCAN to submit your test result, proof of vaccination, quarantine and travel plans.

Check if you qualify for the fully vaccinated traveller exemption

Subscribe or unsubscribe for border alerts

Avoid border wait times at our 26 busiest land-border crossings.

On this page

- Current border wait times
- Other websites for border wait times
- Mobile and online travel applications
- Service standards
- Related links

Current border wait times

This table displays wait times for reaching the CBSA primary inspection booth when crossing the land border from the U.S. to Canada. The table:

- is updated at least once an hour, 24 hours a day and 7 days a week

B-1-33

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- lists border crossings geographically from east to west

To make sure you have our most current information, use your browser's refresh or reload function.

CBSA Office	Commercial Flow	Travellers Flow	Updated
St. Stephen St. Stephen, NB/Calais, ME	Not applicable	No delay	2022-02-18 08:48 AST
St. Stephen 3rd Bridge St. Stephen, NB/Calais, ME	No delay	No delay	2022-02-18 09:45 AST
Edmundston Edmundston, NB/Madawaska, ME	No delay	No delay	2022-02-18 09:14 AST
Woodstock Road Belleville, NB/Houlton, ME	No delay	No delay	2022-02-18 09:14 AST
Stanstead Stanstead, QC/Derby Line, VT	No delay	No delay	2022-02-18 08:14 EST
St-Armand/Philipsburg St. Armand, QC/Highgate Springs, VT	No delay	No delay	2022-02-18 08:14 EST
St-Bernard-de-Lacolle Lacolle, QC/Champlain, NY	No delay	No delay	2022-02-18 08:14 EST
Cornwall Cornwall, ON/Rooseveltown, NY	No delay	No delay	2022-02-18 08:14 EST

B-1-34

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CBSA Office	Commercial Flow	Travellers Flow	Updated
Prescott Prescott, ON/Ogdensburg, NY	No delay	No delay	2022-02-18 08:14 EST
Thousand Islands Bridge Lansdowne, ON/Alexandria Bay, NY	No delay	No delay	2022-02-18 08:14 EST
Sault Ste. Marie Sault Ste. Marie, ON/Sault Ste. Marie, MI	No delay	No delay	2022-02-18 08:02 EST
Fort Frances Bridge Fort Frances, ON/International Falls, MN	No delay	No delay	2022-02-18 07:14 CST
Queenston-Lewiston Bridge Queenston, ON/Lewiston, NY	4 minutes	2 minutes	2022-02-18 08:30 EST
Rainbow Bridge Niagara Falls, ON/Niagara Falls, NY	Not applicable	No delay	2022-02-18 08:30 EST
Peace Bridge Fort Erie, ON/Buffalo, NY	4 minutes	14 minutes	2022-02-18 08:30 EST
Blue Water Bridge Sarnia, ON/Port Huron, MI	15 minutes	No delay	2022-02-17 16:13 EST
Windsor and Detroit Tunnel Windsor, ON/Detroit, MI	No delay	No delay	2022-02-18 08:14 EST

B-1-35

CBSA Office	Commercial Flow	Travellers Flow	Updated
Ambassador Bridge Windsor, ON/Detroit, MI	No delay	No delay	2022-02-18 08:14 EST
Emerson Emerson, MB/Pembina, ND	No delay	No delay	2022-02-18 07:14 CST
North Portal North Portal, SK/Portal, ND	No delay	No delay	2022-02-18 06:06 MST
Coutts Coutts, AB/Sweet Grass, MT	No delay	No delay	2022-02-18 06:05 MST
Abbotsford-Huntingdon Abbotsford, BC/Sumas, WA	No delay	No delay	2022-02-18 05:14 PST
Pacific Highway Surrey, BC/Blaine, WA	6 minutes	No delay	2022-02-18 05:30 PST
Douglas (Peace Arch) Surrey, BC/Blaine, WA	Not applicable	No delay	2022-02-18 05:30 PST
Boundary Bay Delta, BC/Point Roberts, WA	No delay	No delay	2022-02-18 05:14 PST

B-1-36

Other websites for border wait times

Our listing of these sites does not mean that we endorse any referenced businesses:

- U.S. Customs and Border Protection wait times
- Ontario Ministry of Transportation
- Transports Québec

B-1-36

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- Niagara Falls Bridge Commission Information is updated every 5 minutes.
- Peace Bridge Information is updated every 5 minutes.
- Detroit-Windsor Tunnel
- British Columbia
- Washington State

B-1-37

Mobile and online travel applications

Use ArriveCAN to submit test results, proof of vaccination, travel and quarantine plans (mandatory before entering Canada by air or land).

Use the CanBorder app to help plan your next cross-border trip.

Service standards

Visit Service standards: Fiscal year 2020 to 2021 for border wait times for:

- highway traveller primary processing
- highway commercial primary processing

Related links

- COVID-19: Current border measures and requirements
- Plan your trip across the border
- CBSA Directory of Offices and hours of operation
- Canada to U.S. border wait times - Travel.gc.ca

Date modified:
2022-02-18

B-1-37

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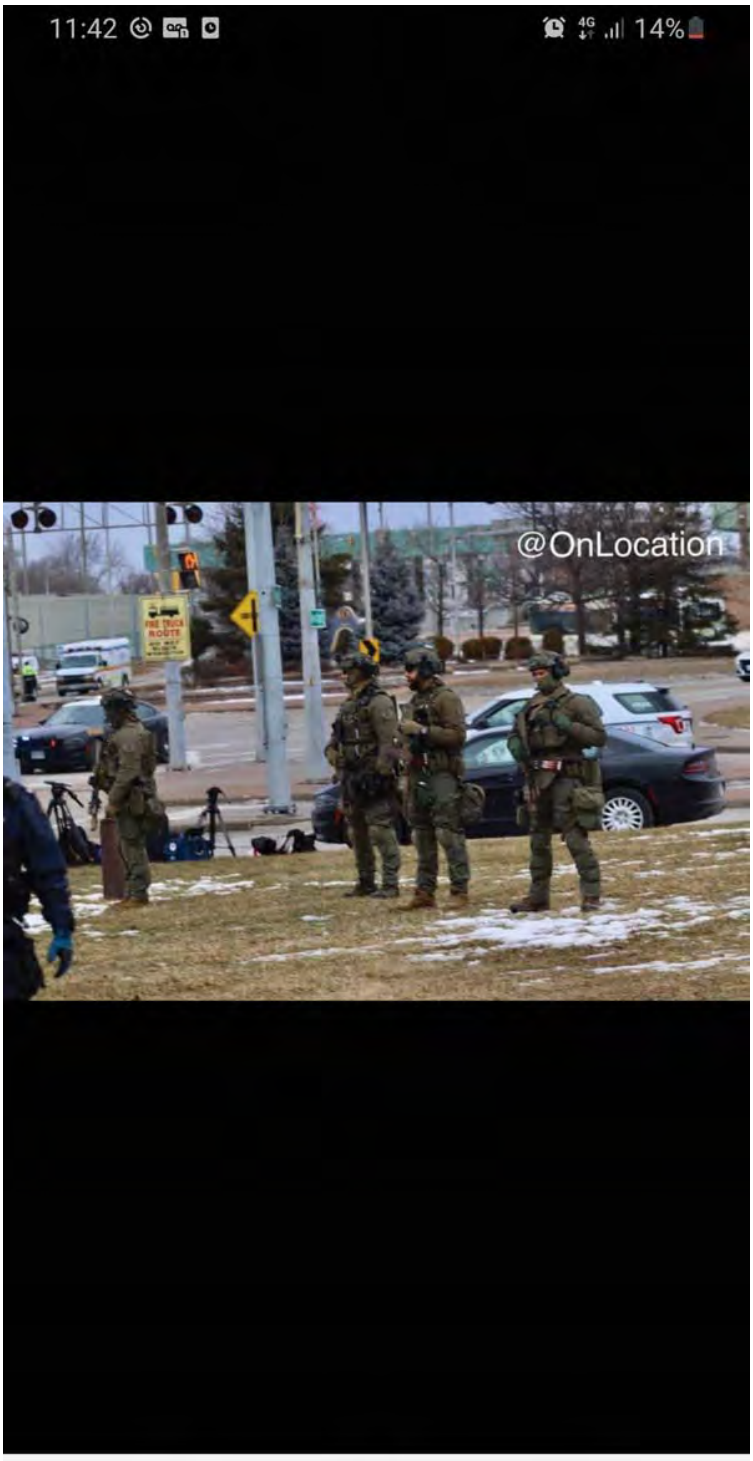

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WINDSOR STAR

B-1-41

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Local News

West end businesses feeling impact of Huron Church closures post-blockade

Kathleen Saylors

Feb 16, 2022 • Last Updated 1 day ago • 4 minute read

Fred Bouzide, owner of Fred's Farm Fresh International Market on Huron Church Road in Windsor is shown on Tuesday, February 15, 2022. The city blocked off access to his business from Huron Church. PHOTO BY DAN JANISSE /Windsor Star

Residents and businesses in Windsor's west end are still feeling the pinch from last week's Ambassador Bridge blockade — but with the bridge now cleared, it's traffic control measures meant to prevent another blockade causing headaches.

STORY CONTINUES BELOW

NISSAN QASHQAI CANADA CALLS

B-1-41

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B-1-42

Residents frustrated by protest near Ambassador Bi

Some Windsor Ont. residents say theyre frustrated with the ongoing protest in

Protesters were cleared from the Ambassador Bridge and Huron Church Road over the weekend following a week-long blockade. Now, police have set up road closures to prevent a new crop of protesters from once again blocking bridge traffic.

“Currently there is a traffic strategy in place that does involve traffic interruptions based on a buffer zone that we created as a sustainable but temporary solution,” Windsor police Chief Pam Mizuno told Windsor city council Monday.

“That of course was not an easy decision as we understand the impact that has on our community. However, we have to balance that with the risk of other protests.”

Huron Church Road is open only to border-bound bridge traffic from E.C. Row Expressway to Patricia Road, where transport trucks enter onto the bridge.

STORY CONTINUES BELOW

B-1-42

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B-1-43

Regular traffic is being rerouted, and east/west traffic crossing Huron Church at major intersections has been blocked. Traffic can cross Huron Church Road at points north of the bridge entrance, according to updates and maps from the Windsor Police Service Tuesday.

Fred Bouzide, owner of Fred's Farm Fresh International Market on Huron Church Road in Windsor is shown on Tuesday, February 15, 2022. The city blocked off access to his business from Huron Church. He is shown with flowers that he said would have normally sold out on Valentine's Day. PHOTO BY DAN JANISSE /Windsor Star

But the strategy is costly for local businesses, who said they've been hurt by reduced traffic and difficult detours.

"We have maybe $5,000 $6,000 worth of flowers sitting here in my cooler that I'm stuck with," said Fred Bouzide, owner of Fred's Farm Fresh on Huron

B-1-43

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B-1-44

"It's one of our biggest flower days, especially for the winter ... along with all the other loss of sales for our meats, produce, canned foods and everything else."

STORY CONTINUES BELOW

The entrance to Fred's Farm Fresh has been blocked by police in a bid to halt east/ west flow that could see protesters block Huron Church Road once more.

Bouzide said he said he's noticed a drop in customers since the beginning of the blockade that has continued with current road closures, even though there's a circuitous backroad entrance to the market.

"We're not selling shoes, if we don't sell them today we can sell them tomorrow," Bouzide said. "We have perishable items that we can't keep on the shelf."

"It's quite out of the way for everyone ... You want to pull your hair out."

B-1-44

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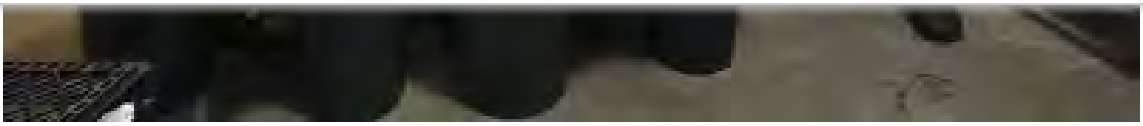
B-1-45



Fred Bouzide, owner of Fred's Farm Fresh International Market on Huron Church Road in Windsor is shown on Tuesday, February 15, 2022. The city blocked off access to his business from Huron Church. He is shown with flowers that he said would have normally sold out on Valentine's Day. PHOTO BY DAN JANISSE /Windsor Star

Another Huron Church Road business, Monaco Express Lebanese Grill, said in social media posts and in an answering machine message it will close until further notice because of disruptions along the roadway, citing its blocked parking lot.

STORY CONTINUES BELOW

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Windsor deputy police chief Jason Bellaire said traffic was a priority but that he did not want to provide an "artificial estimate" of when traffic will completely reopen.

"The natural movement of traffic flow on our roadways has to be temporarily reconsidered so we can protect access to our public infrastructure, the bridge, given the circumstances we found ourselves in," Bellaire told council Monday, adding he did not want to provide an "artificial estimate" of when traffic would reopen.

Ward 2 Coun. Fabio Costante, whose ward spans Huron Church Road, said he has experienced the inconvenient road closures first-hand.

"I've heard from many residents and businesses and I expect I'll be hearing from many more in the coming days," Costante said. "It's caused a great inconvenience for many residents who commute and use Huron Church every

B-1-45

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"I totally understand and empathize with the inconvenience caused."

Costante emphasized that emergency traffic and first responders will have free passage as needed, which is why some intersections may be blocked by a combination of physical barrier and police vehicle.

"Police were emphatic that their operational plan was built with that in mind and emergency services will not suffer or be delayed as a result," Costante said, a message reiterated by Windsor police on social media Tuesday.

Costante said there are different access points and back roads to businesses in the area, both along Huron Church and nearby Wyandotte Street West, University Avenue and Sandwich Street.

"Absolutely if you can support those businesses, that would be great."

STORY CONTINUES BELOW

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B-1-47

and have posted City of Windsor information on social media for patients looking to get to the hospital. Patients are encouraged to check traffic information before heading to the hospital.

In a statement Monday, Windsor Mayor Drew Dilkens said the closures were necessary to maintain the border crossing after the significant impact of last week's blockades.

"To ensure that we can maintain a reliable border crossing for trade and commerce in the immediate near term, we need to ensure Huron Church Road remains cleared," Dilkens said. "We commit to working closely with businesses along the route who are adversely impacted by these short-term and time-limited measures."

STORY CONTINUES BELOW

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MORE ON THIS TOPIC

Ambassador Bridge reopens following week-long protest
Author of the article:

Residents can follow the Windsor Police Service for updates on road closures, while police and city staff will update businesses along the route.

Bouzide, who said Fred's Farm Fresh can be accessed from Daytona Avenue off Northwood Street from Dominion Boulevard, thanks customers who continue to patronize the store.

B-1-47

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ksaylors@postmedia.com

twitter.com/KathleenSaylors

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By Taylor Campbell
1 week ago

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By Brian Cross
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Ambassador Bridge reopens following week-long protest

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B-1-49

3 days, 19 hours ago

LOCAL NEWS

Bridge protest arrests swell to 46, 90 charges laid

By Taylor Campbell
2 days, 11 hours ago

THIS WEEK IN FLYERS

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_____

A Commissioner, etc.

B-1-51

AUTOS

Renault expects to make 300,000 fewer cars in 2022 as global chip shortage rumbles on

PUBLISHED FRI, FEB 18 2022•7:36 AM EST

Sam Shead
@SAM_L_SHEAD

WATCH LIVE

KEY POINTS

Renault made 500,000 fewer cars last year as a result of the chip shortage.

“The situation right now is still pretty complicated,” de Meo told CNBC’s Street Signs Europe Friday.

De Meo said that Renault expects the chip crunch to become less severe this year, adding that a “normal situation” should resume in the second half of 2022.

BREAKING NEWS

B-1-51

VIDEO 03:58

B-1-52

Renault CEO: We will lose 300,000 potential units in 2022 due to chip shortage

Renault CEO Luca de Meo said the French carmaker expects to make 300,000 fewer units in 2022 than it potentially could have as a result of the ongoing global chip shortage.

Renault made 500,000 fewer cars last year as a result of the chip shortage. In September, consulting firm AlixPartners predicted the chip shortage would cost the auto industry $210 billion in revenue.

"The situation right now is still pretty complicated," de Meo told CNBC's Street Signs Europe Friday.

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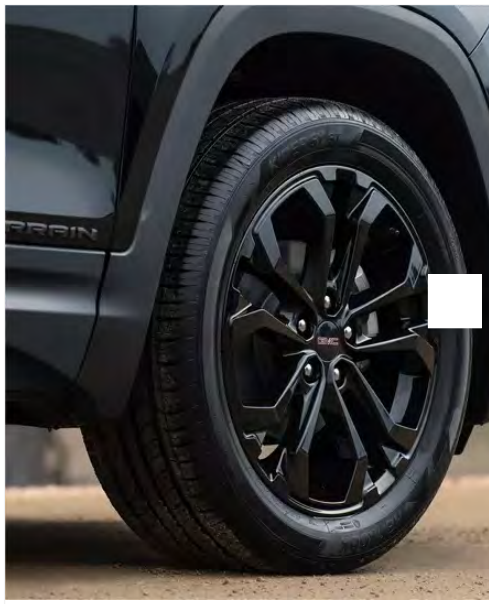

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BREAKING NEWS

De Meo said that Renault expects the chip crunch to become less severe this year, adding that a "normal situation" should resume in the second half of 2022.

His comments came as Renault reported an 888 million euro ($1 billion) net profit for 2021 on Friday, beating estimates. The carmaker claims its operating margin of 3.6%

B-1-52

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puts it two years ahead of its own "revolution revitalization" plan. "Renault is back on track," de Meo said.

B-1-53

Squawk on the Street

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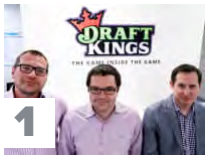
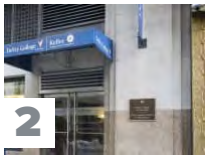


1 **Stocks making the biggest moves premarket: DraftKings, Roku, Deere and others**



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B-1-55

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B-1-57

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Here's What Roofers Do Instead of Cleaning Gutters (It's Genius)

Then they saw it work. Today almost every house in the neighborhood has it! I get so many thanks (especially in Fall) for my little 'pioneer method'Watch this amazing 'lazy' gutter protection method in action

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by Taboola

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Man Who Predicted 2020 Crash Says Do This Now

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B-1-58

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Lauren Feiner

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Peter Schacknow AN HOUR AGO

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Hugh Son

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B-1-58

B-1-59

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B-1-62

Windsor

Windsor couple weighs closing pet store after being left out of COVID-19 relief funding

Couple purchased store just before the pandemic and can't qualify for programs

Dale Molnar · CBC News · Posted: Feb 10, 2022 1:10 PM ET | Last Updated: February 10

Mark and Melissa Lafreniere own the Petwise Pet Supply store in Windsor. (Dale Molnar/CBC News)

comments

B-1-62

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A Windsor couple are on the verge of bankruptcy and closing their pet supply store because they say they can't access funding from federal and provincial COVID-19 relief programs.

B-1-63

"We're not eligible for any funding because of when we took over," said Melissa Lafreniere, who along with her husband Mark bought the Petwise Pet Supply store at 6000 Tecumseh Rd. East on April 1, 2020.

The Lafrenieres say all the programs they tried to access require tax information from the previous year's operation.

- **Windsor area has highest number of people working, looking for work in years**

"Everything we filled out for we were just declined because we didn't file taxes the year prior," said Mark.

The Lafrenieres say they are debt to the tune of about $180,000 because of lockdowns, restrictions and a shortage of goods due to supply chain issues.

They have lost so much money they say they couldn't reopen this year and their store is temporarily closed and may not reopen if they don't get relief.

"The things we would have been eligible for in the past now there's no more eligibility for them," said Melissa, adding they have three employees who aren't working right now either.

While the Lafrenieres have only owned the store for two years, the store has been there for several years under previous ownership.

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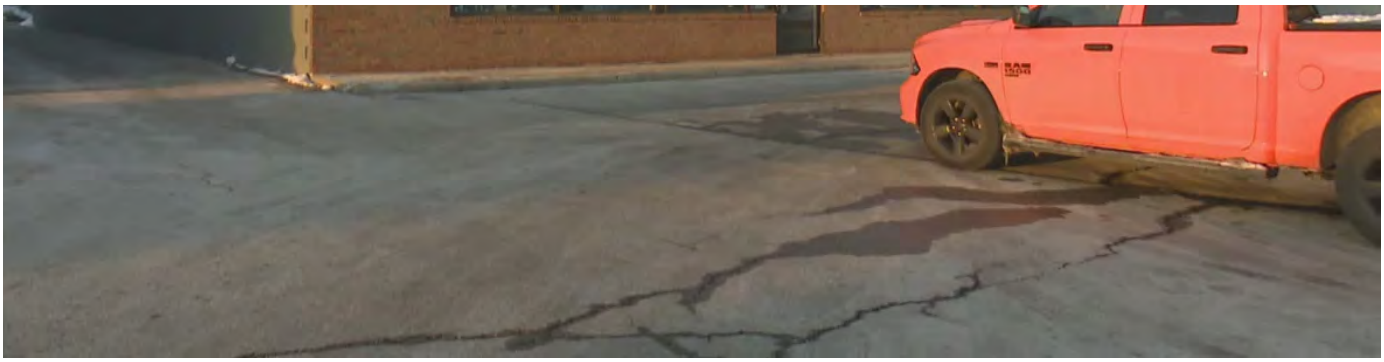

The Petwise Pet Supply Store on the verge of closure because the owners say it doesn't qualify for COVID relief funding. (Dale Mollnar/CBC News)

Brenda St. Pierre has been a regular customer. She doesn't want to see the store close because she can only get certain items from this store she can't get elsewhere.

"We get bones and we get all kinds of stuff we can't get somewhere else and it's going to be very devastating for her [Melissa] and us customers that rely on her items," said St. Pierre.

Brenda St. Pierre is a regular customer of the Petwise Pet Supply store. (Dale Molnar/CBC)

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The Lafrenieres say they have sought help from MP Irek Kusmierczyk, MPP Percy Hatfield and Coun. Gary Kaschak but they have only referred them to links to programs they have already tried.

CBC News has reached out to Kusmiercyzk and Premier Doug Ford for comment.

In December, Ontario Finance Minister Peter Bethlenfalvy said the province will take action to help businesses.

"There's a lot of businesses, small businesses in particular, that have been hit hard through the last 21, 22 months, and we've provided a lot of supports," Bethlenfalvy said.

The following month, the Ontario government initiated a program that would provide $10,000 in relief, but it's only for businesses that had to close completely this year due to the recent shutdowns. The pet store was closed but only due to the financial problems, not because it was required to.

MPP Lisa Gretzky has written the premier demanding the province help small businesses like this that have fallen through the cracks.

The letter reads in part: "In 2021 when the first small business grant was announced, many small businesses were left out of any financial aid due to the red tape and narrow parameters of qualifications....I ask you open the portal for the Ontario COVID-19 Small Business Relief Grant and get the funding flowing immediately."

"We as the New Democrats have been calling on the province since the beginning of the pandemic to have a concrete plan in place to support small businesses as we go through lock downs and opening up and partial lock downs and we've been asking for designated and more widely available programs to support small businesses," said Gretzky, who points to businesses who have been denied claims because of spelling mistakes on the forms.

The Lafrenieres will decide at the end of this month whether to close permanently.

"I think there should be more help for small businesses," said Melissa.

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The Record

B-1-68

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WATERLOO REGION

What does Ontario's decision on vaccine mandates mean for laid-off unvaccinated workers?

Employers not rushing to bring back unvaccinated workers

By **Robert Williams** Record Reporter
Wed., Feb. 16, 2022 | 3 min. read

WATERLOO REGION — As the province looks to move out of its proof-of-vaccination requirements next month, don't expect employers to move as quickly on mandatory vaccination requirements for its workers.

From nurses to personal support workers to police officers, thousands of workers across an array of industries have either been put on leave or terminated from their positions for not following mandatory COVID-19 vaccination protocols at workplaces in Ontario.

Those decisions — mostly enforced over the past six months — came in a climate when the province was mandating vaccines for access to everything from restaurants to gyms to movie theatres.

On Monday, the Ontario government announced it will officially remove vaccine mandates in all non-essential businesses on March 1. Premier Doug Ford said vaccine requirements will remain for now in high-risk settings like long-term care and health care, but the expectation is those mandates could be removed in the coming weeks or months if numbers continue to trend downward.

The health care sector in particular saw a large exodus when it mandated vaccinations last fall, with hundreds of workers from multiple departments leaving the region's hospitals in a time when staffing shortages have plagued the industry.

But don't expect those unvaccinated workers to return to hospital settings any time soon.

In a co-ordinated response from St. Mary's General Hospital, Grand River Hospital, Guelph General Hospital, Cambridge Memorial Hospital, Wellington Health Care Alliance and Groves Memorial Hospital, the network said it is not currently considering bringing back the workers despite provincial posturing.

"The pandemic is not yet over, and local hospitals are still working at, or above capacity to provide the care that is needed by our community," said spokesperson Cheryl Evans. "As a high-risk setting that needs to take steps to protect patients and team members, at this time we have no plans to review or change our policy which is based in science and supported by infection prevention and control experts and the provincial science table."

While numbers in the province are going down, vaccination has played an important role in getting to this point, said Evans, and will continue to be a contributor to making hospital settings safe for everyone.

At the Region of Waterloo, a decision has yet to be made whether the province's announcement will alter its guidance on mandatory vaccinations for staff.

"Human resources staff are reviewing our vaccination policy and determining the appropriate next steps as it relates to yesterday's announcement from the province," said spokesperson Lynsey Slupeiks. "We will communicate with staff when there is more information to share."

In other sectors, businesses will have to determine how they intend to proceed through this new phase of the pandemic.

Since the rollout of the vaccine, workplaces with hybrid models have been better suited to accommodate staff who choose not to get vaccinated, only requiring proof for those who are forced to work in-person.

This is the case for Communitech and its tenant companies, where vaccination is only required for staff working on the premises.

"We will continue to give the option for team members to work remotely as needed during the period of transition and going forward — we are committed to offering a hybrid workplace model," said Communitech chief operating officer Rick Coccimiglio.

"We will wait for guidance on how we will address safety measures once and if the restrictions lift on March 1."

But many businesses that require in-person work do not have the luxury of giving staff the option, and have been forced to place many on unpaid leave.

"I assume staff who were not terminated but placed on leave would be allowed to return once a mandate is not in place," said Emmett Macfarlane, a political-science professor at the University of Waterloo.

"Workplaces can still regulate in the interests of health and safety, and so I would assert could continue to enforce a vaccine mandate. Indeed, continuing to maintain vaccine mandates would be consistent with Ontario's Occupational Health and Safety Act."

Further, he said, any employers or businesses would have "very strong grounds" for refusing access to unvaccinated individuals.

"The private sector might take the lead on this if it so chooses."

RW **Robert Williams** *is a Waterloo Region–based reporter for The Record. Reach him via email: robertwilliams@torstar.ca*

Read more about: Doug Ford

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HOLD THE LINE

AGAINST MEDICAL TYRANNY

Windsor just delayed Ambassador Bridge traffic for a week, Dilkens labeled protesters 'mentally unstable,' and Trudeau enacted emergency powers.

LET'S TALK ABOUT THAT.

Windsor Regroups to Rally at the Flag

WHEN

Sat, Feb 19th @2pm

WHERE

Great Canadian Flag @ Windsor Riverfront

Windsor rallies monthly to end tyranny in Canada, just west of the Great Canadian Flag on the riverfront. The next will take place March 19th, at 2p.m.

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B-1-75

AUTOMOTIVE PARTS MANUFACTURERS' ASSOCIATION Applicant	- and -	**JIM BOAK et al** Respondents	- and -	**THE CITY OF WINDSOR et al** Intervenors

B-1-75

Court File No.: CV-22-00030791-0000

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PROCEEDING COMMENCED AT
WINDSOR

SUPPLEMENTAL AFFIDAVIT OF SHERRI MARIE PERONI SWORN FEBRUARY 18, 2022

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